

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**DAKOTA G. FISCHER, :
Plaintiff, : Case No. 2:19-cv-1342
vs. : Chief Judge Edmund A. Sargus, Jr.
REMINGTON ARMS COMPANY, LLC : Chief Magistrate Judge Elizabeth P. Deavers
et al., :
Defendants. :**

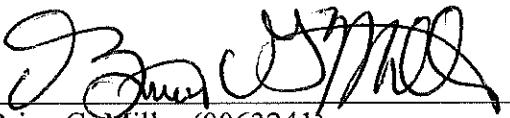
**STIPULATION OF DISMISSAL OF
DEFENDANT REMINGTON ARMS COMPANY, LLC**

Pursuant to Fed.R.Civ.Proc. 41(a)(1)(ii), Plaintiff, Dakota Fischer ("Plaintiff"), and Defendant, Remington Arms Company, LLC ("Defendant") by and through counsel, hereby stipulate and agree as follows:

1. Based, in part, upon the deposition testimony of February 26, 2020, Plaintiff agrees to dismiss his claims with prejudice against Defendant.
2. In exchange for Plaintiff's agreement to dismiss all claims, Defendant and Defendant's counsel and law firm will not seek attorney fees, costs, or sanctions against Plaintiff, or Plaintiff's law firm and lawyers.
3. Plaintiff and Plaintiff's lawyers further agree to preserve their entire file relative to this matter, as well as all related evidence in their possession, including without limitation all physical evidence, photographs (in their native format), deposition exhibits, and documentation of communications with anyone (in their native format), until a written communication between them and counsel for Defendant or an Order of this Court revises or terminates this preservation agreement. Plaintiff's law firm and lawyers agree to address any reasonable inquiries with

respect to production of the same and/or comply with any Court orders with respect to production of the same.

4. Defendant Remington intends to pursue sanctions against a non-party and requests that this Court retain jurisdiction over any such motions filed by Remington for sanctions and/or recovery of costs and attorneys fees.



Brian G. Miller (0063241)
Brian G. Miller Co., L.P.A.
250 West Old Wilson Bridge Road, Suite 270
Worthington, Ohio 43085
Telephone: (614) 221-4035
Facsimile: (614) 987-7841
Email: bgm@bgmillerlaw.com

Counsel for Plaintiff

/s/ Steven E. Danekas w/authority 3/11/2020

Robert V. Kish (0075926)
Remington Co., L.P.A.
200 Civic Center Drive, Suite 800
Columbus, Ohio 43215
Telephone: (614) 232-2416
Email: rkish@reminger.com

Steven E. Danekas
Swanson Martin & Bell, L.L.P.
330 North Wabash, Suite 3300
Chicago, IL 60611
Telephone: (312) 923-8273
Email: sdanekas@smbtrials.com
Admitted Pro Hac Vice

*Counsel Defendant Remington Arms
Company, LLC*